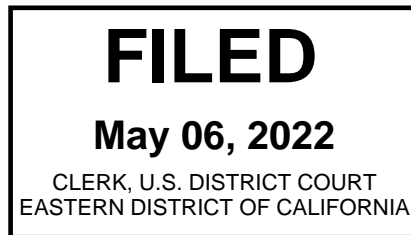


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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
YVONNE GAIDE,  
  
Defendant.

CASE NO. 2:22-cr-0095 JAM

18 U.S.C. § 1343 – Wire Fraud; 18 U.S.C.  
§ 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal  
Forfeiture

I N F O R M A T I O N

COUNT ONE: [18 U.S.C. § 1343 – Wire Fraud]

The United States Attorney charges:

YVONNE GAIDE,  
defendant herein, as follows:

**I. INTRODUCTION**

At all times relevant to this Information:

1. SCHENELLE M. FLORES, charged elsewhere, resided in Sacramento, California. SCHENELLE M. FLORES was employed as a manager in the Office of AIDS at the California Department of Public Health in Sacramento, California. The Office of AIDS was responsible for working on behalf of the State of California to combat the HIV and AIDS epidemic, including providing

supplies and services to local health jurisdictions.

2. Individual 1 resided in Sacramento, California.

3. CHRISTINE M. IWAMOTO, charged elsewhere, resided in Sacramento, California.

Beginning in approximately March 2018, CHRISTINE M. IWAMOTO operated SOLE PROPRIETORSHIP 1, which purported to be a consulting business. CHRISTINE M. IWAMOTO was employed by the Office of AIDS until March 2018.

4. Individual 3 resided in Sacramento, California. Beginning in approximately March 2018, Individual 3 operated SOLE PROPRIETORSHIP 2, which purported to be a business providing website and information technology services.

5. Individual 4 resided in the Fresno, California, area. Individual 4 was the Chief Executive Officer of CORPORATION 1, located in Coarsegold and then Fresno, California. CORPORATION 1 had a contract with the California Department of Public Health to provide services to the Office of AIDS, including distributing condoms and other harm reduction supplies.

6. Individual 5 lived in the Fresno, California, area. Individual 5 was the Chief Financial Officer of CORPORATION 1.

7. YVONNE GAIDE resided in Orangevale, California. YVONNE GAIDE was employed as an analyst in the Office of AIDS at the California Department of Public Health in Sacramento, California.

## **II. SCHEME TO DEFRAUD**

8. Beginning by about December 2017, and continuing until at least about November 2018, SCHENELLE M. FLORES, CHRISTINE M. IWAMOTO, defendant YVONNE GAIDE, and others known and unknown to the Grand Jury knowingly devised, intended to devise, and participated in a material scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, promises, and half-truths.

9. The purpose of the scheme was to divert funds from the California Department of Public Health for the personal use of SCHENELLE M. FLORES, CHRISTINE M. IWAMOTO, YVONNE GAIDE, and others known and unknown to the Grand Jury.



1 including SOLE PROPRIETORSHIP 1 and SOLE PROPRIETORSHIP 2. SCHENELLE M. FLORES  
2 submitted to CORPORATION 1 invoices for those businesses with multiple false representations,  
3 promises, and half-truths, including about the individuals associated with the businesses and the services  
4 performed or promised to be performed for the Office of AIDS.

5 14. CHRISTINE M. IWAMOTO opened a bank account in the name of SOLE  
6 PROPRIETORSHIP 1, whose entity name indicated that it provided consulting services. CHRISTINE  
7 M. IWAMOTO coordinated with SCHENELLE M. FLORES to request payment from  
8 CORPORATION 1 for work ostensibly performed or promised to be performed by SOLE  
9 PROPRIETORSHIP 1 for the Office of Aids. Individual 3 opened a bank account in the name of SOLE  
10 PROPRIETORSHIP 2, whose entity name indicated that it provided website technology services. The  
11 invoices submitted by SCHENELLE M. FLORES directed CORPORATION 1 to make payments to the  
12 bank accounts that were controlled by CHRISTINE M. IWAMOTO and Individual 3, despite the fact  
13 that CHRISTINE M. IWAMOTO, Individual 3, SOLE PROPRIETORSHIP 1, and SOLE  
14 PROPRIETORSHIP 2 were not doing work for the Office of AIDS. The funds paid by  
15 CORPORATION 1 were then used for personal purposes by CHRISTINE M. IWAMOTO, Individual 3,  
16 SCHENELLE M. FLORES, Individual 1, YVONNE GAIDE, and others.

17 15. It was further part of the scheme that SCHENELLE M. FLORES, Individual 4,  
18 Individual 5, and others caused the personal expenses, including debit card purchases, gift card  
19 purchases, and invoice payments, to be charged to the state contract. Individual 4 and Individual 5 did  
20 so knowing that SCHENELLE M. FLORES had falsely designated personal debit card purchases as  
21 expenses under the state contract. Individual 4 submitted invoices to the Office of AIDS on behalf of  
22 CORPORATION 1 that contained false representations, promises, and half-truths, including that the  
23 expense amounts claimed on the invoices were for HIV prevention services and that the amounts  
24 claimed were owed to CORPORATION 1 for expenses under the contract. SCHENELLE M. FLORES  
25 and YVONNE GAIDE presented those invoices for payment by the State of California, despite knowing  
26 that the invoices contains such false representations, promises, and half-truths.

27 16. As a result of the scheme, SCHENELLE M. FLORES, CHRISTINE M. IWAMOTO,  
28 Individual 1, Individual 3, YVONNE GAIDE, and their families and friends obtained a total of at least

approximately \$2 million in personal benefits, including but not limited to cash and purchased items. Individual 4 and Individual 5 obtained substantial personal compensation through CORPORATION 1, including 2018 annual salaries of approximately \$440,000 each, as a result of maintaining the contract with the California Department of Public Health.

#### IV. USE OF THE INTERSTATE WIRES

17. On or about the date listed below, for the purpose of executing the aforementioned scheme and artifice to defraud and attempting to do so, YVONNE GAIDE, as more specifically charged below, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, pictures and sounds:

| <u>COUNT</u> | <u>ON OR ABOUT<br/>DATE</u> | <u>WIRE DESCRIPTION</u>   |
|--------------|-----------------------------|---|
| 1            | May 30, 2018                | Wire transfer of \$70,000 from CORPORATION 1's J.P. Morgan Chase account ending #2567 to SOLE PROPRIETORSHIP 1's Bank of America account ending #9782 |

All in violation of 18 U.S.C. §§ 2 and 1343.

FORFEITURE ALLEGATION: [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

1. Upon conviction of the offense alleged in Count One of this Information, defendant SCHENELLE M. FLORES shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, which constitutes or is derived from proceeds traceable to such violations, including but not limited to the following:

a. A sum of money equal to the total amount of proceeds traceable to such offenses, for which defendant is convicted.

2. If any property subject to forfeiture, as a result of the offense alleged in Count One of this Information, for which defendant is convicted:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

Dated: May 6, 2022

PHILLIP A. TALBERT  
United States Attorney

By:



CHRISTOPHER S. HALES  
Assistant United States Attorney

**United States v. Yvonne Gaide**

**Penalties for Information**

**COUNT 1:**

VIOLATION: 18 U.S.C. § 1343 – Wire Fraud

PENALTIES: A maximum of up to 20 years in prison; or  
Fine of up to \$250,000, or twice the gross gain or twice the gross loss, whichever is  
greater; or both fine and imprisonment  
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**FORFEITURE ALLEGATION:**

VIOLATION: 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

PENALTIES: As stated in the charging document